IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

JEFFREY D. TREVILLION, Special)	
Adm'r for the Estate of MAURICE)	
PENDLETON, deceased,)	
)	
Plaintiff,)	
)	
VS.)	Case No. 18-cv-0707-G
)	
BD. of OKLA. CTY. COMM'RS for)	
OKLA. CTY., OKLA., et al.,)	
)	
Defendants.)	

MOTION OF DEFENDANT, BOARD OF COUNTY COMMISSIONERS OF OKLAHOMA COUNTY FOR STIPULATED JUDGMENT

- 1. This matter was amicably settled.
- 2. In order to effectuate the settlement, the Board of County Commissioners of Oklahoma County ("BOCC") requests that the Court approve the settlement pursuant to 51 OS §158(A).
- 3. The terms of the settlement are that the Plaintiff has agreed to a Stipulated Judgment against the BOCC in the amount of \$1,250,000.00. A proposed Stipulated Judgment will be submitted separately in accord with the ECF Manual.
 - 4. The Plaintiff has authorized entry of the Stipulated Judgment.
- 5. The Plaintiff and BOCC agree that no known outstanding liens exist that have not been retired by an agreement between Plaintiff and any lienholder.
- 6. The parties have agreed that each shall absorb their own attorney fees and costs.

- 7. The proposed Stipulated Judgment is also supported by a written common law release of all claims and releases the BOCC and all employees and officials.
- 8. The parties have agreed to waive any hearing by the Court regarding the foregoing and the proposed Stipulated Judgment.

Respectfully submitted,

s/ Randall J. Wood

Robert S. Lafferrandre, OBA #11897 Randall J. Wood, OBA #10531 PIERCE COUCH HENDRICKSON BAYSINGER & GREEN, L.L.P. 1109 North Francis Avenue Oklahoma City, OK 73106 rlafferrandre@piercecouch.com rwood@piercecouch.com

Attorneys for Defendants Board of County Commissioners of Oklahoma County

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

J. Spencer Bryan
Steven J. Terrill
BRYAN & TERRILL LAW, PLLC
9 East 4th Street, Suite 307
Tulsa, OK 74103
jsbryan@bryanterrill.com
sjterrill@bryanterrill.com

Damario D. Solomon-Simmons M. David Riggs Kymberli J.M. Heckenkemper RIGGS, ABNEY, NEAL, TURPEN, **ORBISON & LEWIS** 502 West 6th Street Tulsa, OK 74119 dsimmons@riggsabney.com driggs@riggsabney.com kheckenkemper@riggsabnev.com Melvin C. Hall RIGGS, ABNEY, NEAL, TURPEN, **ORBISON & LEWIS** 528 N.W. 12th Street Oklahoma City, OK 73103 mhall@riggsabney.com Attorneys for Plaintiffs

James L. Gibbs, II
GOOLSBY, PROCTOR, HEEFNER & GIBBS, PC
701 N. Broadway Avenue, Suite 400
Oklahoma City, OK 73102-6006
(405) 524-2400/(405) 525-6004 (F)
jgibbs@gphglaw.com
Attorney for Defendant, Tommie Johnson III

Attorney for Defendant, Tommie Johnson III in his Official Capacity as Sheriff of Oklahoma County

John W. Coyle, III
W. Brett Behenna
COYLE LAW FIRM
125 Park Avenue, 1st Floor
Oklahoma City, OK 73102
jc@coylelaw.com
bc@coylelaw.com
Attorneys for Defendant Brian Maughan,

Attorneys for Defendant Brian Maughan, individually

W. R. Moon, Jr.
Chris J. Collins
COLLINS, ZORN & WAGNER, P.C.
429 N.E. 50th Street, 2nd Floor
Oklahoma City, OK 73105-1815
wrm@czwlaw.com
cjc@czwlaw.com
Attorney for Defendant, P.D. Taylor,

s/ Randall J. Wood
Randall J. Wood

individually